

EXHIBIT E

CONFIDENTIAL

Page 1

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEW JERSEY

4
5 -----X
6 IN RE:

7 AMERICAN MEDICAL COLLECTION AGENCY, INC.
8 CUSTOMER DATA SECURITY BREACH LITIGATION,
9
10

11
12 This Document Relates To:
13 Quest/Optum Track
14 -----X

15
16 DATE: February 28, 2023
17 TIME: 10:00 A.M.
18

19
20 REALTIME VIDEOTAPED DEPOSITION
21 of the 30(b)(6) Witness, TERRI CETERA,
22 taken by the Plaintiff, pursuant to a
23 Subpoena and to the Federal Rules of Civil
24 Procedure, held at the offices of McCARTER
25 & ENGLISH, LLP, 100 Mulberry Street, Four
Gateway Center, Newark, New Jersey 07102,
before Karyn Chiusano, a Notary Public of
the State of New York.

CONFIDENTIAL

Page 2

A P P E A R A N C E S:

SEEGER WEISS, LLP

Attorneys for the Plaintiff

IN RE: AMERICAN MEDICAL COLLECTION
AGENCY, INC. CUSTOMER DATA SECURITY
BREACH LITIGATION

55 Challenger Road ~ 6th Floor
Ridgefield Park, New Jersey 07660

BY: CHRISTOPHER L. AYERS, ESQ.

CAyers@seegerweiss.com

SIDLEY AUSTIN, LLP

Attorneys for QUEST/OPTUM TRACK

One South Dearborn

Chicago, Illinois 60603

BY: DAVID H. HOFFMAN, ESQ.

david.hoffman@sidley.com

ALSTON & BIRD

Attorneys for OPTUM360 LLC

90 Park Avenue

New York, New York 10016

BY: DONALD HOUSER, ESQ.

donald.houser@alston.com

HOGAN LOVELLS

Attorneys for LAB CORP

390 Madison Avenue

New York, New York 10017

BY: COURTNEY HELT, ESQ.

courtney.helt@hoganlovells.com

(Appearances continued on following page.)

CONFIDENTIAL

Page 3

A P P E A R A N C E S: (Continued)

ALSO PRESENT:

PETE COOPER, Videographer

ALEXA PASTOR, Concierge

CARLY ANDERSEN, Seeger Weiss

PAUL KATTAS, ESQ.,

In-House Counsel, QUEST

MARISA LEVITT, ESQ., Sidley Austin, LLP

STEVE McINERNEY, ESQ., Sidley Austin, LLP

FRAZER THOMAS, ESQ.

BRADLEY BARTOLMEO, ESQ.

* * *

CONFIDENTIAL

Page 6

1 TERRI CETERA

2 is McCarter & English at 4 Gateway
3 Center in Newark, New Jersey.

4 My name is Pete Cooper
5 representing Veritext and I am the
6 videographer. The Court Reporter is
7 Karyn Chiusano from the firm
8 Veritext.

9 All appearances by counsel will
10 be held upon the stenographic record.

11 I am not authorized to
12 administer an oath. I am not related
13 to any party in this action, nor am I
14 financially interested in the
15 outcome.

16 If there are any objections to
17 the proceeding, please state them
18 now.

19 Hearing no objections, the
20 Court Reporter may now swear in the
21 witness and we can proceed.

22 THE COURT REPORTER: Can you
23 raise your right hand, please?

24 (Witness complies.)

25 THE COURT REPORTER: Do you

CONFIDENTIAL

Page 7

1 TERRI CETERA

2 swear that the testimony you are
3 about to give will be the truth, the
4 whole truth and nothing but the
5 truth, so help you, God?

6 THE WITNESS: I do.

7 T H E R E S A C E T E R A, called as a
8 witness, having been first duly sworn by a
9 Notary Public of the State of New York, was
10 examined and testified as follows:

11 THE COURT REPORTER: Wonderful.

12 Can I kindly have your name;
13 spelling please?

14 THE WITNESS: Theresa,
15 T-H-E-R-E-S-A; Cetera, C-E-T-E-R-A.

16 THE COURT REPORTER: Can I have
17 your address, please?

18 You can provide business.

19 THE WITNESS: 500 Plaza Drive,
20 Secaucus, New Jersey.

21 THE COURT REPORTER: Thank you.

22 Any time you're ready, sir, I'm
23 ready for you.

24 MR. AYERS: All right. Thank
25 you.

CONFIDENTIAL

Page 315

1 TERRI CETERA

2 physician-oversight services, that would be
3 an essential-type service.

4 Q. Okay. Do you consider
5 collections services essential services?

6 MR. HOFFMAN: Objection to
7 form.

8 A. Collection services are part of
9 billing services and so billing is a
10 critical service to the organization.

11 Q. With collections, you have --
12 you have engaged a multitude of providers;
13 is that correct?

14 A. So, we have collect -- we have
15 contracted with Optum to do our billing and
16 so Optum has contracted with collection
17 service providers.

18 Q. Let's backtrack to 2014 to 2016
19 timeframe, when that responsibility was
20 direct with Quest.

21 Quest, in 2014, engaged six
22 different vendors; correct?

23 A. We did.

24 Q. And that it could shift
25 placement between any of the vendors at any